

**THE LAW OFFICES OF
JOSÉPH A. BONDY**

JOSEPH A. BONDY

**STEPHANIE R. SCHUMAN
(OF COUNSEL)**

**1776 BROADWAY
SUITE 2000
NEW YORK NY 10019
TEL 212.219.3572
JOSEPHBONDY@MAC.COM**

September 28, 2021

Hon. Lorna G. Schofield
United States District Judge
Southern District of New York
Thurgood Marshall U.S. Courthouse
40 Foley Square, Courtroom 1106
New York, N.Y. 10007

Re: United States v. Sharma, et. al, 18-cr-340 (LGS)

Dear Judge Schofield,

I respectfully request adjournment of Mr. Trapani's October 27, 2021 sentencing by approximately one month, to either the week of November 22 or the following week.

On October 12, 2021, I am commencing *voir dire* before the Hon. J. Paul Oetken, in United States v. Parnas, et. al., 19-cr-725 (JPO). The Government estimates a two-week trial, while the defense estimates three weeks. The requested adjournment will afford counsel sufficient time to prepare Mr. Trapani's sentencing memorandum subsequent to the verdict.

I have spoken with both AUSA Negar Tekeei and Probation Officer Ashley Geiser, neither of whom oppose the requested adjournment. We would also ask that any deadlines for disclosure of the PSR be adjourned commensurately as well.

Thank you for consideration of this application.

Application Granted in part. Defendant Trapani's sentencing hearing is adjourned to **January 11, 2022, at 11:00 a.m.** The Government's pre-sentencing submission, if any, shall be filed by **December 13, 2021**. Defendant's pre-sentencing submission shall be filed by **December 17, 2021**. The Clerk of the Court is directed to terminate the letter motion at docket number 529.

Respectfully submitted,

/S/
Joseph A. Bondy
Counsel to Raymond Trapani

cc: AUSA Negar Tekeei; USPO Ashley Geiser

Dated: September 28, 2021
New York, New York


LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE